

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**Lynk Labs, Inc.**

*Plaintiff,*

v.

**Home Depot USA, Inc., The Home Depot Inc.,  
and Home Depot Product Authority, LLC,**

*Defendants.*

**Case No. 6:21-cv-00097-ADA**

**JURY TRIAL DEMANDED**

---

**CASE READINESS STATUS REPORT**

Plaintiff Lynk Labs, Inc. (“Plaintiff” or “Lynk Labs”) and Defendants Home Depot USA, Inc., The Home Depot, Inc., and Home Depot Product Authority, LLC (“Defendants” or “Home Depot”), hereby provide the following status report in advance of the initial Case Management Conference (CMC).

**FILING AND EXTENSIONS**

Plaintiff’s Original Complaint was filed on January 29, 2021 and the first Amended Complaint was filed on March 17, 2021.

**RESPONSE TO THE COMPLAINT**

Defendants responded to the Amended Complaint on April 12, 2021 by filing an Answer to First Amended Complaint for Patent Infringement, Additional Defense and Counterclaims.

**PENDING MOTIONS**

There are currently no Motions pending.

**RELATED CASES IN THIS JUDICIAL DISTRICT**

There are currently no related cases.

**IPR, CBM, AND OTHER PGR FILINGS**

There are no known IPR, CBM, or other PGR filings.

**NUMBER OF ASSERTED PATENTS AND CLAIMS**

Plaintiff has asserted nine (9) patents and a total of eighteen (18) claims. Plaintiff intends to assert additional claims from the eighteen presently asserted patents in its preliminary infringement contentions, which are forthcoming.

**APPOINTMENT OF TECHNICAL ADVISER**

At this point, the parties do not request a technical adviser to be appointed to the case to assist the Court with claim construction or other technical issues.

**MEET AND CONFER STATUS**

Plaintiff and Defendants conducted a meet & confer conference on April 19, 2021. The parties have no pre- Markman issues to raise at the CMC.

Dated: April 19, 2021

Respectfully submitted,

/s/ Darlene F. Ghavimi

Darlene F. Ghavimi  
Texas State Bar No. 24072114  
**K&L GATES LLP**  
2801 Via Fortuna, Suite #350  
Austin, TX 78746  
Tel.: 512.482.6919  
Fax: 512.482.6859  
Darlene.ghavimi@klgates.com

Devon C. Beane  
K&L Gates LLP  
70 W. Madison Street, Suite 3300  
Chicago, IL 60602  
(312) 807-4436  
Fax: (312) 827-8000  
Email: [devon.beane@klgates.com](mailto:devon.beane@klgates.com)

James A. Shimota  
K&L Gates LLP  
70 W. Madison Street, Suite 3300  
Chicago, IL 60602  
(312) 807-4299  
Fax: (312) 827-8000  
Email: [jim.shimota@klgates.com](mailto:jim.shimota@klgates.com)

Nelson M. Hua  
K&L Gates LLP  
70 W. Madison Street, Suite 3300  
Chicago, IL 60602  
(312) 807-4312  
Fax: (312) 827-8000  
Email: [nelson.hua@klgates.com](mailto:nelson.hua@klgates.com)

**ATTORNEYS FOR PLAINTIFF**

*/s/ Aaron G. Fountain*

---

Aaron G. Fountain  
Texas Bar No. 24050619  
DLA PIPER LLP (US)  
303 Colorado, Suite 3000  
Austin, TX 78701  
Tel: 512.457.7125  
Fax: 512.457.7001  
[aaron.fountain@dlapiper.com](mailto:aaron.fountain@dlapiper.com)

Nicholas G. Papastavros (Pro Hac Vice pending)  
DLA PIPER LLP (US)  
33 Arch Street, 26th Floor  
Boston, MA 02110-1447  
Tel: 617.406.6000  
Fax: 617.406.6100  
[nick.papastavros@dlapiper.com](mailto:nick.papastavros@dlapiper.com)

**ATTORNEYS FOR DEFENDANTS**